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RAYMUNDO ESCOBAR

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:25-CR-15-TLN-1
Plaintiff,)
vs.) **STIPULATION AND ORDER TO CONTINUE**
RAYMUNDO ESCOBAR,) **STATUS CONFERENCE AND EXCLUDE TIME**
Defendant.) Date: February 6, 2025
) Time: 9:30 A.M.
) Judge: Hon. Troy L. Nunley, Chief District Judge
)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Emily Sauvageau, counsel for Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Mr. Escobar, that the status conference, currently set for February 06, 2025, may be continued to April 10, 2025, at 9:30 a.m., with time between the dates excluded, as detailed below.

The parties specifically stipulate as follows:

1. The indictment in this case was filed on January 23, 2025. Dkt. 13.
2. The government has relayed that there are are several related cases to the instant matter.
3. Undersigned defense counsel represents that she requires additional time to investigate this case, conduct legal research, consult with her client, and otherwise prepare for trial. Additionally, the parties are negotiating issues related to

1 discovery. Undersigned defense counsel believes that failure to grant the requested
2 continuance would deny her the reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.

4 4. The government does not object to the continuance.

5 5. All time has been excluded through and including February 06, 2025. *See* 18
6 U.S.C. § 3161(c)(1); *see also* dkt. 13, 15.

7 6. The parties stipulate that the ends of justice served by granting the continuance
8 outweighs the best interest of the public and Mr. Escobar in a speedy trial, and
9 respectfully request the Court so to find. For the purpose of computing time under
10 18 U.S.C. § 3161 *et seq.* (the Speedy Trial Act), the parties request that the time
11 period between February 06, 2025 and April 10, 2025 (inclusive) be deemed
12 excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it
13 would result from a continuance granted by the Court at the defense's request,
14 based on a finding that the ends of justice served by granting the continuance
15 outweighs the best interest of the public and Mr. Escobar in a speedy trial.

16 The parties therefore respectfully request this Court to adopt the parties' stipulation in its
17 entirely as its Order.

18 Respectfully submitted,

19 HEATHER E. WILLIAMS
20 Federal Defender

21 Date: January 30, 2025

22 /s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
RAYMUNDO ESCOBAR

23
24 Date: January 30, 2025

25 MICHELE BECKWITH
26 Acting United States Attorney

27 /s/ Emily Sauvageau
28 EMILY SAUVAGEAU
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: January 30, 2025

Troy L. Nunley
Chief United States District Judge